

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)	
)	
v.)	Docket No. 20-cr-40036-TSH
)	
)	
VINCENT KIEJZO)	
)	

ASSENTED-TO MOTION FOR LEAVE TO FILE
MEMORANDUM IN EXCESS OF TWENTY PAGES

Now comes the defendant Vincent Kiejzo and hereby moves, pursuant to Local Rule 7.1(b)(4), for permission to file a memorandum (Motion to Suppress Evidence, and Request for Franks Hearing) in excess of twenty pages in this matter. In support of this motion, counsel for the defendant states that his Motion to Suppress addresses not just the search warrant materials, but the underlying investigation that gave rise to the issuance of the warrant in this case. Counsel also intends to submit numerous exhibits, and intends to incorporate and cite those throughout the memorandum. In order to properly and thoroughly marshal the extensive facts and apply the law, he requests leave to file a brief in excess of twenty pages. Counsel for the defendant anticipates being able to submit a memorandum of no more than 35 pages.

Pursuant to Local Rule 7.1, counsel conferred with the government and understands that the government assents to this motion. Therefore, defendant moves for leave to file his Motion to Compel that will be in excess of twenty pages.

Respectfully submitted,
VINCENT KIEJZO
By His Attorney,

/s/ Sandra Gant
Sandra Gant, B.B.O.# 680122
Federal Public Defender Office

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CERTIFICATE OF SERVICE

I, Sandra Gant, hereby certify that this document filed through the ECF system will be sent electronically to the registered participant(s) as identified on the Notice of Electronic Filing (NEF) on May 23, 2022.

/s/ Sandra Gant

Sandra Gant